



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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October 29, 2015

Stuart Dearden  
Sanofi-Aventis U.S.  
55 Corporate Drive  
Mail Code 55A-300A  
Bridgewater, NJ 08807

Subject: DEQ Review "2015 Groundwater Monitoring Work Plan Former Rhone-Poulenc Portland Site"  
RP-Portland Site  
ECSI #155

Dear Mr. Dearden:

The Oregon Department of Environmental Quality (DEQ) received the subject work plan on October 5, 2015. The work plan was prepared by Golder Associates Inc. for StarLink Logistics Inc. (StarLink) to provide current groundwater quality data to support the feasibility study (FS), and initiate long term groundwater monitoring that will be adjusted during the FS process for Rhone-Poulenc site (the Site). Thank you for the submittal. DEQ's review comments are presented below.

## General Comments

1. The work plan was submitted in a letter format. Please submit future work plans in report format and titled as drafts until approved by DEQ.
2. The work plan was submitted prior to DEQ's approval of the FS work plan and does not sufficiently address DEQ's comments regarding data gaps identified in previous submittals. While there may be benefits to starting a groundwater monitoring program prior to completing the feasibility study work plan, it is not clear from the stated objectives how the results of proposed monitoring will adequately address data needs moving into the FS. Please provide more specific explanation of the goals and relational for monitoring the selected wells consistent with our pending comments to the FS work plan and previous submittals.

## Specific Comments

1. **Page 1, Section 1.0 Objectives.** The stated objectives are overly general do not provide sufficient information for DEQ to review how the associated work will address the stated objectives. Please provide more specific objectives to address data gaps identified by DEQ and EPA in previous documents and a detailed rationale for the data collected from each of the proposed monitoring wells. For example; Section 4.12 Potential Feasibility Study Data Gaps of the *RI/SCE Addendum*; Specific Comment #9 of DEQ's July 2, 2015 review of the *Revised Final Human Health Risk Assessment*; and Specific Comment #4 of DEQ's August 25, 2015 review of the *Off-Property Screening Level Human Health*

*Risk Evaluation* all present specific data gaps identified by DEQ that must be considered in a comprehensive FS for the Site.

2. **Page 2, Section 3.0 Scheduling and Reporting.** The work plan states that if access is not granted by a third-party for a given monitoring event, no work will be performed at the monitoring location. Access agreements need to be in place prior to starting groundwater monitoring. Please modify the work plan to reflect this requirement.
3. **Page 2, Section 3.0 Scheduling and Reporting.** The work plan states that validated laboratory results, data validation reports, field sampling data, and water level monitoring data will be provided with Quarterly RI/FS Progress Reports. Depending on the revised objectives, more robust reporting may be appropriate.

DEQ appreciates the work conducted by StarLink to prepare the draft groundwater monitoring plan. Please feel free to contact me at 503 229-6748 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Manzano', with a stylized flourish at the end.

Scott Manzano, Project Manager  
DEQ NWR Cleanup Program

C:     Joan Underwood, Quantum Management Group  
        Jim Benedict, Cable, Huston, Benedict, Haagensen & Lloyd  
        Eva DeMaria/EPA  
        Gary Vrooman, DOJ Natural Resources  
        ECSI #155

